

[Parties and Counsel Listed on Signature Pages]

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR (PHK)

**JOINT STIPULATION AND [PROPOSED]
ORDER TO MODIFY PRETRIAL
SCHEDULE**

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, and through their undersigned counsel,
2 Meta, TikTok, Snap, and YouTube (“Defendants”); the MDL Personal Injury and School District
3 (“PI/SD”) Plaintiffs; and the MDL State Attorneys General (“State AGs”) (collectively, the “Parties”)
4 hereby agree to the following negotiated amendment of the Pretrial Schedule entered by the Court in
5 CMO No. 18 (ECF 1290), *as modified* in ECF 2147 and CMO No. 26 (ECF 2208).

6 WHEREAS, in CMO No. 26, the Court set briefing schedules and page limits on (1) motions for
7 summary judgment in the School District Bellwether Cases and (2) Rule 702 motions on General
8 Causation experts and School District experts, and reset the hearing on those motions from January 9,
9 2025 to January 26, 2026. ECF 2208.¹

10 WHEREAS, the Court ruled that “[a]ny remaining motions, including motions specific to the
11 personal injury plaintiffs, if appropriate, shall be decided in the next phase of this litigation.” *Id.*

12 WHEREAS, in light of these scheduling orders, and pursuant to the Court’s guidance at the
13 August 22, 2025 Case Management Conference, Plaintiffs and Defendants have met and conferred about
14 the timing of witness lists and jury instructions, as well as certain other case management deadlines.

15 WHEREAS, the Parties agree, subject to Court approval, that it will benefit all sides’ trial
16 readiness, particularly in light of the significant briefing deadlines occurring throughout this fall, to
17 make minor adjustments to these deadlines.

18 NOW, THEREFORE, the Parties hereby jointly stipulate and request that the Court approve the
19 following proposed amended pretrial schedule:
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27 ¹ The briefing schedule for motions for summary judgment on the State AGs’ claims and Rule 702
28 motions on four AG-specific experts is set forth in ECF 1955, 2139, and 2251.

Event	Current Deadline	Proposed Deadline
Exchange Preliminary Witness Lists ²	September 10, 2025	September 24, 2025
Dispositive and Rule 702 (<i>Daubert</i>) Motions: Opening Briefs ³	September 24, 2025 ⁴	September 30, 2025 ⁵
Deadline to Meet and Confer Regarding Whether Any Additional and Unanticipated Discovery May Be Needed on Disclosed Witnesses and to Develop a Plan for Completing Any Agreed-Upon Additional Discovery	September 22, 2025	October 6, 2025
Submit Joint Status Report on Results of Meet and Confer on Additional and Unanticipated Discovery on Disclosed Witnesses	September 24, 2025	October 8, 2025
Submit Joint Letter Brief on Any Remaining Discovery Disputes on Disclosed Witnesses	September 29, 2025	October 13, 2025
Exchange Preliminary Proposed Jury Instructions ⁶	September 22, 2025	October 20, 2025
October Case Management Conference	October 24, 2025 9:00am	October 24, 2025 9:00am
Dispositive and Rule 702 (<i>Daubert</i>) Motions: Opposition Briefs	October 27, 2025	November 7, 2025
November Case Management Conference	November 19, 2025 2:00pm	November 19, 2025 2:00pm

² The parties have agreed and ask the Court to so-order that this deadline (i) shall apply only to witnesses to be called live at trial (as opposed to witnesses who will testify via prerecorded deposition testimony, who will be identified during the designation process); (ii) shall apply to the school district but not the personal injury bellwether cases, with witnesses for the personal injury cases to be identified at a later date; (iii) for the State AG cases, will apply to Meta witnesses only, with the exchange of State Witnesses to be deferred, as set forth more specifically in ECF 2249.

³ All dispositive and *Daubert* motion deadlines in this chart apply only to the briefs that the Court has permitted pursuant to CMO No. 26.

⁴ Subject to exceptions for certain experts deposed on or after September 11, 2025. *See* ECF 2147.

⁵ The State AGs and Meta have agreed and ask the Court to so-order that Meta may file a separate Rule 702 motion of no more than 10 pages on October 3, 2025, as to AG-only expert Dr. Prinstein, as he is unable to be deposed on the date the parties previously scheduled due to recently scheduled congressional testimony.

⁶ The parties ask the Court to so-order that this deadline shall apply only to the school district bellwether cases (with jury instructions for the personal injury cases to be exchanged at a later date, after the Court has set deadlines for motions for summary judgment in those cases). The jury instruction deadlines in this chart (originally from CMO No. 18) are not applicable to the State AG claims. *See* ECF 2208 (setting October 10 deadline to submit AG jury instructions).

Dispositive and Rule 702 (<i>Daubert</i>) Motions: Reply Briefs	November 25, 2025	December 5, 2025
File Proposed/Disputed Jury Instructions and Additional Questions for Juror's Survey Monkey Questionnaire	October 27, 2025	December 8, 2025
December Case Management Conference	December 15, 2025 9:00am (Zoom)	December 15, 2025 9:00am (Zoom)

IT IS SO STIPULATED, through Counsel of Record.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Honorable Yvonne Gonzalez Rogers
United States District Judge

Respectfully submitted,

DATED: September 12, 2025

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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: September 12, 2025

By: /s/ Ashley M. Simonsen